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FDADocket No. 99D-4488 and 99D-4489
Dockets Management Branch (HFA - 305),
5630 Fishers Lane, rm. 1061
Rockville, MD 20852

I was very suprised and disturbed to hear of the new regulations that are planned for the sprouting industry in response to the salmonella incidences a few years back. I am a 40 yr old woman who has been trying very hard to care for my health by eating thoughtfully and exercising. Sprouts are an important part of my diet, as well as other organically grown food items.

As a resident of a semiurban area, I also am trying to develop relationships with the agricultural community, and support family run farms and organic growing practices. I feel that this will ensure the health of our land and our bodies. Organically grown sprouts have no problem with salmonella contamination because compost rather than manure is used in the farming of the seed. The composting process kills bacteria. These ethical and caring producers will be put out of business by your regulations, and we will loose an nutritionally powerful, environmentally friendly and very basic food source.

The FDA should add to the Guidance a clause which states that "Certified Organic as well as seed certified by FDA as for human consumption is considered an acceptable alternative approach to prevention of microbial hazards in sprouted seeds."

It is ridiculous to demand that all sprout growers have an in-house lab and that they use toxic levels of bleach (which is a known carcinogen and a terrible pollutant) on a long-term basis. Most sprout growers can not afford labs (and would therefore be forced to cease operations) and many — hopefully — know that the dumping of bleach for the sake of producing a health food is absolutely absurd - especially at the levels currently used and suggested in the guidance. Also, the lack of good bacteria in sterilized sprouts is a major loss to consumers. We are, after all, dependent on commensal bacteria!

By allowing sprout growers to use seed fit for human consumption the small growers can survive. The big growers will still have the option of buying any seed, as long as they fulfill the sterilization and lab testing requirements outlined in the guidance.

Sincerely,



99D-4488 + 99D-4489

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CROSS FILE SHEET

File Number: 99D-4488/C */0*

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